



<b>FILED</b>	
Department of Business and Professional Regulation	
Senior Deputy Agency Clerk	
CLERK	Brandon Nichols
Date	2/22/2021
File #	

February 22<sup>nd</sup>, 2021

Mr. Mo Madani  
Florida Building Commission  
c/o Florida Department of Business & Professional Regulation  
1940 North Monroe Street  
Tallahassee, FL 32399  
Via e-mail: [Mo.Madani@dbpr.state.fl.us](mailto:Mo.Madani@dbpr.state.fl.us)

**DS 2021-006**

**SUBJECT: Petition for Declaratory Statement Before the Florida Building Commission  
Regarding the following: Florida Building Code, Chapter 22, Section 2222 HVHZ,  
clause 2222.4.3**

Dear Mr. Madani:

Please consider this letter as a request or a petition for a declaratory statement before the Florida Building Commission. The request involves the material thickness in the design of our Steel Roll Up Doors

For over 50 years, Trachte Building Systems has been a designer and manufacturer of roll up doors and public storage buildings. Our roll up doors are used in our public storage buildings, but the doors are not exclusive to our buildings or to the public storage marketplace. Since 2005, we have maintained Product Approval for a number of our door models with the Florida Business & Professional Regulations. Our revision number, FL8055, is presently compliant with the 2017 Building Code

Our doors have been tested to ASTM E330 and they can sustain a wind load of 175mph. We are presently considering expanding into the Miami-Dade market / HVHZ and have scheduled the door impact testing to TAS 201-94, TAS 202-94 and TAS 203-94. Under clause 2222.4.3 referenced above, the statement advises that "Metal siding and roof panels shall be not less than 24 gauge". Our doors are presently being made using 26-gauge material.

The question we pose is: If our doors, made with the 26-gauge material, pass the requirements of TAS 201-94, TAS 202-94 and TAS 203-94, would we still be required to meet the 24 gauge material thickness requirement as stated in 2222.4.3?

Your consideration on this matter is very much appreciated. Feel free to contact me if you have any questions about this request.

Sincerely,

Michael J. Kasten, P.E.  
Quality Assurance Manager